

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23
)	

REPLY COMMENTS OF THE COUNCIL OF THE GREAT CITY SCHOOLS

The Council of the Great City Schools, a coalition of 67 of the nation’s largest urban school districts, is pleased to provide Reply Comments to the Commission’s Further Notice of Proposed Rulemaking (FNPRM) on Advancing Broadband Availability for Low-Income Americans through Digital Literacy. The Council applauds the ongoing interest, aim, and action of the Commission to ensure that the benefit of broadband service reaches our nation’s poorest families – many of whom reside in the inner-cities where our member school systems are located. As we noted in our original comments (submitted to Regulations.gov on April 2, 2012 – see Appendix A), we oppose the use of funding from the vital E-Rate funding for the purpose of digital literacy training.

The 67 urban school systems in the Council of the Great City Schools represents only half of one percent of the approximately 14,000 districts in the nation, yet the Great City Schools enroll 28 percent of the nation’s Hispanic students, 33 percent of the nation’s African American students, and 25 percent of the nation’s children living in poverty. The value of the E-Rate is immeasurable to these students and the inner-city. Results on the National Assessment of Education Progress (NAEP) during the past decade has shown that while urban districts still lag behind academically, they have made significant and greater gains than any other entity in the United States. These are test results the entire nation should be encouraged about, and the E-Rate has done its part by helping schools provide a modern learning environment for urban school children. It is essential that the Commission ensure that E-Rate support remains available for the nation’s neediest schools in order to maintain and accelerate their current pace of improvement.

As stated in our comments, we understand the Commission's objective to increase the digital literacy of communities across the nation, particularly those in poor areas where a strong need exists. The importance of digital literacy was also noted by a great number of the original comments submitted to the FNPRM. But we would also stress that the overwhelming response of stakeholders was that the limited E-Rate funding was not an appropriate source to pay for these costs. This position was held by our urban school districts, as well as schools and libraries from other locales across the nation, included those represented by EdLINC, and private industry groups such as the United States Telecom Association.

Many of the comments echoed our original sentiments that the E-Rate program is continually underfunded, and adding additional uses of funds like digital literacy training will only add to this problem. The E-Rate program does not have sufficient resources to meet the nation's needs for its existing eligible services. In fact, after the original comments were submitted, the Administrator released the demand estimates for Funding Year 2012, which showed that requests for the upcoming funding year exceeded \$5 billion. The gap between the basic needs of applicants and available funding may be even wider this year, and Priority 2 reimbursements for even the poorest applicants may be limited.

Finally, we continue to note that state and local funding cuts in recent years have affected the amount of money districts have available for a range of services, and among the budget items hardest hit are infrastructure and technology upgrades. In the current economic environment, we reiterate that the Commission should not dilute the already shallow pool of E-Rate funding for additional services such as digital literacy. Despite national indicators of economic recovery, education budget cuts continue to accumulate and may take many years to recover from multiple years and billions of dollars of reductions. Urban schools are doing their best to keep afloat financially and focus their dwindling resources on teaching and learning. We feel the Commission should preserve E-Rate funds for existing services only, and help school districts keep the classrooms running.

Thank you for your consideration of our comments, and please do not hesitate to contact me if you need any additional information.

Sincerely,
Manish Naik

Manager of Legislative Services

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APPENDIX A
Comments submitted on April 2, 2012

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The 67 urban school systems in the Council of the Great City Schools represents only half of one percent of the approximately 14,000 districts in the nation, yet the Great City Schools enroll 28 percent of the nation's Hispanic students, 33 percent of the nation's African American students, and 25 percent of the nation's children living in poverty. The value of the E-Rate is immeasurable to these students and the inner-city. Results on the National Assessment of Education Progress (NAEP) during the past decade has shown that while urban districts still lag behind academically, they have made significant and greater gains than any other entity in the United States. These are test results the entire nation should be encouraged about, and the E-Rate has done its part by helping schools provide a modern learning environment for urban school

children. It is essential that the Commission ensure that E-Rate support remains available for the nation's neediest schools in order to maintain and accelerate their current pace of improvement.

We understand the Commission's objective to increase the digital literacy of communities across the nation, particularly those in poor areas where a strong need exists. Modern innovations of technology and communications are an integral part of our current and future lives and workplaces, and training citizens on the use of available technologies is important for participation and success in an information-rich society. However, the E-Rate program for schools and libraries is not the appropriate source of funding for this endeavor, no matter how important.

A basic education is also a requirement for achievement and stability in modern life. For urban school districts, the E-Rate program helps provide a baseline of services that must be sustained in order for schools to offer this basic education in a productive learning environment. The goals of the E-Rate program, as outlined by Congress in the 1996 Telecommunications Act, are grounded in the assistance that applicants need to build and maintain the foundation for all future learning.

Digital literacy training, as proposed in the FNPRM, is not part of the foundation for which the E-Rate was created, and the purpose it still serves today. The technology and information that E-Rate allows schools to access is used to instill the fundamentals of a K-12 education. But it is important to note that the E-Rate does not support the actual content or curriculum itself. As laid out in the Telecommunications Act, it is the *access* that the program provides.

The benefit that technology can provide to students and educators requires additional costs and services beyond access, yet by statute the E-Rate is limited in its support. Fundamental electrical upgrades necessary to power 21st century networks and computer usage are not permitted. End user devices and products which allow schools to maximize the E-Rate-funded networks, such as laptops and curriculum software, are ineligible. Many communications components within our districts are not authorized, including a school's public-address system and Automatic Call Distribution (ACD) systems. Finally, research has overwhelmingly found that training teachers on the use of technology is an absolute must to enhance the delivery of modern educational instruction. Yet this training, however necessary to capitalize on the benefits of technology, was not included in the statutory mandate to provide access and has never been eligible for E-Rate funding.

In past notices, the Commission has remarked on the importance of training instructional staff to both realize and maximize the benefits of the E-Rate. As noted in the Further Notice of Proposed Rulemaking, the statute does include a paragraph titled "SPECIAL SERVICES," in Section 254(b)(3), which states: "In addition to the services included in the definition of universal service under paragraph (1), the Commission may designate additional services for such support mechanisms for schools, libraries, and health care providers for the purposes of subsection (h)." We do not believe this paragraph extends E-Rate support to an array of additional services, no matter how deserving of funding.

As an example, the training of instructional staff, universally recognized as vital to the end goals of preparing K-12 students with the educational foundation needed for college and career

success, could have been labeled as an allowable special service since the E-Rate's inception. But teacher training is not found within "the purposes of subsection (h)" as Section 254(b)(3) requires, and has always been ineligible. The digital literacy training which the Commission is currently considering is also not within those purposes, and should not be funded by E-Rate. We also note that the American Library Association (ALA), whose members are likely the primary beneficiary of funding for digital literacy training, is opposed to the use of E-Rate money for this purpose.

Finally, we urge the Commission to not allow the E-Rate to fund digital literacy efforts simply because the program does not have sufficient resources to meet the nation's needs for its existing eligible services. We appreciate the Commission's recent decision to increase the E-Rate funding cap based on inflation moving forward, but these additions will do little to satisfy the annual demand that our nation's schools require to meet their E-Rate-eligible costs. As with other worthy services that the Commission has considered in the past, the limited availability of funding means that these additional costs are not affordable. In this situation, we feel that the Commission should focus the scarce E-Rate funds on keeping existing services to the classrooms running, rather than opening up the program to additional services that it cannot afford.

The success of the program to date has been the result of a specific focus to help the nation's schools and libraries meet the costs associated with accessing advanced telecommunications and information services. In the current economic environment, we do not believe the Commission should dilute the already limited support that E-Rate provides by making additional services eligible for funding. Despite national indicators of economic recovery, education budget cuts continue to accumulate at the state and local level, adding to the billions of dollars that districts have already lost in recent years. No matter how worthy the intent, the program's urban applicants do not want to see their E-Rate funding cut, as well.

Thank you for your consideration of our comments, and please do not hesitate to contact me if you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. Casserly".

Michael Casserly
Executive Director

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